

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO

IN RE:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,  As representative of  THE COMMONWEALTH OF PUERTO RICO  Debtor	PROMESA  TITLE III  NO: 17 BK 3283-LTS
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**MOTION REGARDING STIPULATION MODIFYING AUTOMATIC STAY  
BETWEEN COMMONWEALTH OF PUERTO RICO AND POPULAR AUTO**

**TO THE HONORABLE COURT:**

COMES NOW, Popular Auto LLC through the undersigned counsel and respectfully states and prays as follows:

1. On April 25, 2018, a Stipulation between Commonwealth of Puerto Rico and Popular Auto LLC was filed requesting the Lift of Stay be modified so that movant may proceed with the civil forfeiture case captioned Popular Auto v. Commonwealth of Puerto Rico, Case No. KAC2017-0409 pending before the Puerto Rico First Instance Court (Docket 2957).

2. Movant's claim under the referred case was filed pursuant to the Uniform Forfeiture Act of 2011, 34 LPRA §1724 et seq.

3. The Stipulation requests that the lift of stay be modified solely to the limited extent necessary to allow the Forfeiture Action to proceed to judgment in the ordinary

course, in accordance with the Uniform Forfeiture Act and should judgment be entered in Movant's favor to allow Movant to pursue such remedy against the Commonwealth provided for under Section 19 of the Uniform Forfeiture Act.

4. Although the agreement was entered freely among the parties it is respectfully requested that this Honorable Court enter an Order granting the parties request so that Movant may proceed with its case in state court without being in contempt under the Bankruptcy Code.

RESPECTFULLY SUBMITTED.

At San Juan, Puerto Rico, this 1<sup>st</sup> day of May, 2018.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY: That on this same date, we electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF Filing system which will send a notification of such to the parties of record and to all interested subscribed users and by certified mail to Nancy Morales Cruz, Esq., attorney for the Department of Justice in the KAC2017-0489 case, to her address, Departamento de Justicia, División de Confiscaciones, PO Box 9020192, San Juan, PR 00902-0192.

*S/ Ricardo R. Pérez Pietri*

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